

ATTACHMENT 3-7 DTTF CONTINGENCY PLAN

1.0 INTRODUCTION: 40 CFR 264.51, 264.52; R315-8-4.2, R315-8-4.3

This contingency plan describes the actions that personnel at the Dugway Thermal Treatment Facility (DTTF) at Dugway Proving Ground (DPG) will take in response to fire, explosion, or an unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, or surface water as required in Utah Administrative Code R315-8-4. This plan will be implemented immediately if a fire, uncontrolled explosion, or unplanned release of hazardous waste occurs that could threaten human health or the environment. This plan describes the following:

- Environmental coordinators,
- Emergency Response Equipment,
- Coordination of Emergency Services,
- Identification of Potential Emergencies,
- Implementation and Emergency Response Procedures,
- Hazard Assessment,
- Evacuation Plan,
- Prevention of Recurrence or Spread of Fires, Explosions, or Spills,
- Identification, Storage, And Treatment of Released Materials,
- Post-Emergency Equipment Maintenance,
- Recordkeeping And Reporting, and
- Amendment of the Contingency Plan.

The DPG organizations that are involved in the contingency plan for the DTTF include the Directorate of Environmental Programs (DEP) and the West Desert Test Center (WDTC). The DTTF Environmental coordinators and other emergency personnel will be trained in the implementation of the DTTF contingency plan as required by the DTTF Training Plan, Attachment 3-5.

2.0 ENVIRONMENTAL COORDINATORS: 40 CFR 264.52(d), 264.55; R315-8-4.3, R315-8-4.6

The DTTF Environmental coordinator or alternate is responsible for directing actions to be taken in response to a fire, explosion, or unplanned release of hazardous waste to the environment at the DTTF. The actions taken by the Environmental coordinator or Alternate are described in Section 6.0. The Environmental coordinators and their telephone numbers are:

Primary Environmental Coordinator Brandon Lawrence
Project Manager CHWSF
Building 6672 Stark Road
Dugway, UT 84022

(435) 831-2997 (work)
(435) 830-7160 (cell)

Alternate Environmental Coordinator Kay Rose
Lead Environmental Technician CHWSF
Building 6672 Stark Road
Dugway, UT 84022

(435) 831-2997 (work)
(435) 830-7161 (cell)

3.0 EMERGENCY RESPONSE EQUIPMENT: R315-8-4.3(d)

As described in Section 4.0, emergency response for the DTTF is provided primarily by the DPG Fire Department in conjunction with the DPG Health Clinic. The DTTF Preparedness and Prevention Plan, Attachment 3-6, lists additional emergency response equipment to be maintained and inspected by DTTF personnel prior to each treatment event.

4.0 COORDINATION OF EMERGENCY SERVICES: 40 CFR 264.52(c), 264.37; R315-8-4.3(b), R315-8-3.7

The DTTF Environmental coordinator is responsible for coordinating emergency services at the DTTF. Range Control personnel (or 911 operators if Range Control is unavailable) coordinate initial emergency response actions at the DTTF. The DPG Fire Department is the primary responder for fire or other emergencies at the DTTF. The DPG U.S. Army Health Clinic is trained and equipped to provide emergency medical services to individuals who are injured in emergencies at the DTTF.

5.0 IDENTIFICATION OF POTENTIAL EMERGENCIES: 40 CFR 264.56; R315-8-4.7

This section describes the following potential emergency situations that may occur at the DTTF and the possibility of any of these situations threatening human health or the environment:

- Uncontrolled explosions,
- Fires, and
- Spills and releases.

5.1 UNCONTROLLED EXPLOSIONS

All operations near an uncontrolled explosion site will be suspended until cleared by the DTTF Environmental coordinator. Prior to restarting operations, process and structural equipment will be inspected for leaks, cracks, and other potential problems. Released waste will be properly collected, contained, and managed. The DPG Fire Department will also be present to monitor and control potential fires or explosions during containment and clean-up operations.

5.2 FIRES

All DTTF operations near an uncontrolled fire will be suspended until cleared by the DTTF Environmental coordinator. Prior to restarting operations, process and structural equipment will be inspected for leaks, cracks, and other potential problems. Released waste will be properly collected, contained, and managed. The DPG Fire Department will also be present to monitor and control potential fires or explosions during containment and clean-up operations.

5.3 SPILLS AND RELEASES

Hazardous wastes are not stored in the DTTF. Sudden release of hazardous wastes or hazardous waste constituents would only occur as a result of an uncontrolled explosion or an uncontrolled fire. It is not anticipated that individuals outside of the vicinity of the DTTF would be affected by the release because of emergency actions taken by DPG.

6.0 **IMPLEMENTATION AND EMERGENCY RESPONSE PROCEDURES: 40 CFR 264.52(b), 264.56; R315-8-4.3(a), R315-8-4.7**

This section describes when the Contingency Plan will be implemented in response to the following emergency situations at the DTTF:

- Uncontrolled explosion.
- Fire that cannot be immediately extinguished, and/or
- Spill or release of hazardous waste or hazardous waste constituents accompanied by any of the following:
 - Release of toxic fumes,
 - Release of a reportable quantity (RQ) of a chemical(s), and/or
 - Evidence of extensive leaching into soil.

6.1 UNCONTROLLED EXPLOSIONS

In the event of an uncontrolled explosion at the DTTF, the person who discovers the explosion or the first responder will proceed as follows:

- From a safe distance contact Range Control by radio (or 911 by telephone if Range Control is unavailable) and supply the following information:
 - The type of incident,
 - Type of material involved, if known,
 - Location and source of the incident,
 - The extent of incident and estimated quantity of waste involved, if known,
 - What is needed in terms of equipment and personnel to combat the emergency, and
 - Until the DTTF Environmental coordinator or alternate arrives, the senior employee present will be responsible for evacuation of personnel from the immediate vicinity.

Range Control personnel (or 911 operators if Range Control is unavailable) perform the following actions:

- § Obtain information on the location and extent of incident,

- § Notify the DPG Fire Department and/or Health Clinic of the emergency situation,
- § Maintain communication with DTTF personnel and emergency response personnel, and
- § Contact the DTTF Environmental coordinator or alternate.

The DPG Fire Department and/or Health Clinic perform the following actions:

- § Respond immediately and appropriately to the emergency, and
- § Assist the DTTF Environmental coordinator as necessary.

The DTTF Environmental coordinator or alternate will perform the following actions:

- § Complete evacuation of the area;
- § Perform a hazard assessment as described in Section 7.0;
- § If a Reportable Quantity (RQ) of any chemical has been released, notify the appropriate state and Federal agencies as described in Section 12.0. This notification should be done as soon as possible after discovery of the incident, preferably within 15 minutes. RQs are listed in 40 CFR 302.4;
- § Assure that possible ignition sources are shut down or removed; and
- § Notify local authorities if assistance is required.

Once the emergency is over, the DTTF Environmental coordinator or alternate has the following responsibilities:

- § Oversee clean up of the area, decontamination of equipment, and disposal of waste generated as a result of the emergency ensuring that proper protective clothing and equipment are used.
- § Determine if it is safe to resume operations by performing an assessment of the safety and integrity of affected areas.

6.2 FIRES

In the event of a fire in the vicinity of the DTTF the person who discovers the fire or the first responder will proceed as follows:

- If properly trained in the use of fire extinguishers, attempt to extinguish a small fire, if possible.
- If the first responder extinguished the fire and no wastes were involved in the fire, the contingency plan does not need to be implemented and no external notifications are required.

If the fire cannot be extinguished, the first responder will perform the following tasks:

- From a safe distance, call 911 by telephone or notify Range Control by radio and supply the following information:
 - The type of incident,
 - Type of material involved, if known,
 - Location and source of the incident,
 - The extent of incident and estimated quantity of waste involved, if known, and
 - Equipment and personnel needed to combat the emergency.

Until the DTTF Environmental coordinator or alternate arrives, the senior employee present will be responsible for evacuation of personnel from the immediate vicinity.

Range Control personnel (or 911 operators if Range Control is unavailable) perform the following actions:

- Obtain information on the location and extent of incident,
- Notify the DPG Fire Department and/or Health Clinic of the emergency situation,
- Maintain communication with DTTF personnel and emergency response personnel, and
- Contact the DTTF Environmental coordinator or alternate.

The DPG Fire Department and/or Health Clinic perform the following actions:

- § Respond immediately and appropriately to the emergency, and
- § Assist the DTTF Environmental coordinator as necessary.

The DTTF Environmental coordinator or alternate will perform the following actions:

- Complete evacuation of the area.
- Perform a hazard assessment as described in Section 7.0.
- If an RQ of any chemical has been released, notify the appropriate State and Federal agencies as described in Section 12.0. This notification should be done as soon as possible after discovery of the incident, preferably within 15 minutes.
- Shut down operations in the surrounding area.
- Assure that possible ignition sources are shut down or removed.
- Notify local authorities if assistance is required for the evacuation.

Once the fire is over, the DTTF Environmental coordinator or alternate has the following responsibilities:

- Oversee clean up of the area, decontamination of equipment, and disposal of waste generated as a result of the emergency ensuring that proper protective clothing and equipment are used.
- Determine if it is safe to resume operations by performing an assessment of the safety and integrity of affected areas.

6.3 SPILLS OR RELEASES

The only containerized waste at the DTTF is residual soil and ash resulting from OB operations. Since no liquids and/or liquid wastes will be generated and/or managed at the DTTF, secondary containment systems are not deemed warranted.

The residual soil and ash wastes are collected after OB treatment activities and are stored in an approved accumulation area pending hazardous waste characterization (see the DTTF Waste Analysis Plan, Attachment 3-02). Prior to placement of residue into a container, the container will be visibly inspected to verify the integrity of the container. Containers will be then be visually inspected once filled and prior to moving to the approved accumulation area to ensure there are no leaks and/or spills. In addition, visual inspection of all containers in the approved accumulation area will be conducted to ensure container integrity and to detect leaks/spill. In the event of an accidental spill or leak from these containers, personnel have the training and on-site tools or equipment needed to stop

or contain the spill or leak. These include drum handling tools, unused barrels into which the remaining ash is transferred, and miscellaneous cleaning tools such as brooms and shovels to collect the ash.

7.0 HAZARD ASSESSMENT: 40 CFR 264.56(c) and (d); R315-8-4.7(c) and (d)

The DTTF Environmental coordinator or alternate will assess the possible hazards to human health and the environment that may result from the fire, explosion, spill, or release of hazardous waste at the DTTF. The assessment will consider both direct and indirect effects of the fire, explosion, spill, or release. The assessment will be based on the following information:

- Character, exact source, amount, and area extent of any release materials,
- Effects of exposure to hazardous waste, and
- Effects of mixtures of hazardous waste involved in the incident.

The assessment will help determine if there is a significant risk to human health or the environment and if additional evacuation is required. If there is a threat to human health or the environment outside of DPG then local authorities will be notified to assist in evacuation and the National Response Center or the U.S. Environmental Protection Agency (EPA) regional on-scene coordinator, and the Utah Department of Environmental Quality (UDEQ) will be notified immediately. The addresses and telephone numbers of these agencies and information to be supplied are in Section 12.0.

8.0 EVACUATION PLAN: 40 CFR 264.52(f); R315-8-4.3(e)

The DTTF is not an occupied building. There are no occupied buildings in the immediate area and the only individuals that would be close to the DTTF will have access to appropriate protective equipment. Therefore an evacuation of the DTTF will only be required in case of fire or explosion in coincidence with a thermal treatment event. Evacuation from the DTTF will be along Durand Road to the Carr Facility as shown in Figure 1.

9.0 PREVENTION OF RECURRENCE OR SPREAD OF FIRES, EXPLOSIONS, OR SPILLS: 40 CFR 264.56(e); R315-8-4.7(e)

All operations near a hazardous waste spill, fire, or uncontrolled explosion site will be suspended until cleared by the DTTF Environmental coordinator or alternate. Prior to restarting operations, process and structural equipment will be inspected for leaks, cracks, or other potential problems. Released waste will be properly collected, contained, and managed.

10.0 IDENTIFICATION, STORAGE, AND TREATMENT OF RELEASED MATERIALS: 40 CFR 264.56(b), (g), and (h)(1); R315-8-4.7(b), (g), and (h)(1)

Whenever there is a fire, explosion, or unplanned release, the DTTF Environmental coordinator or alternate will identify the character, exact source, amount, and area extent of any released material. Identification of materials will be made by a review of operational records, observation of the materials, or, if necessary, laboratory analysis.

The DTTF Environmental coordinator or alternate will coordinate treatment, storage, and disposal of recovered waste, contaminated soil or water, or any other material that results from a fire, explosion,

or release at the facility.

Waste that may be incompatible with the released material will not be stored in the area where the release occurred until clean-up procedures are completed. All operations in the area not directly related to release control and clean-up activities will be suspended until cleared by the DTTF Environmental coordinator or alternate. Access to the clean-up area will be limited to personnel participating in clean-up operations.

11.0 POST-EMERGENCY EQUIPMENT MAINTENANCE: 40 CFR 264.52(e), 264.56(h)(2); R315-8-4.3(d), R315-8-4.7(h)(2)

No fire control, spill control, or decontamination equipment is stored at the DTTF. The necessary equipment is brought to the DTTF for each thermal treatment event. Section 3 contains the list of emergency supplies and equipment available for use at the DTTF.

All emergency response equipment used in response to an emergency at the DTTF will be decontaminated and repaired prior to reuse or it will be replaced. Discarded equipment will be managed as solid or hazardous waste. All emergency equipment used for the DTTF will be inspected in accordance with procedures in the DTTF Inspection Schedule, Attachment 3-4 of this permit.

Before operations are resumed at the DTTF, the Environmental coordinator or alternate will notify UDEQ and the Environmental Protection Agency (EPA) that:

- Clean up of the affected areas has been completed so that normal operations may be resumed.
- All emergency equipment has been cleaned and is fit for use.

12.0 RECORDKEEPING AND REPORTING: 40 CFR 264.56(d)(2), (i), and (j); R315-9-1(b) and (c), R315-8-4.7(i) and (j)

Any emergency that results in a release to the air, soil, or water of hazardous waste or hazardous constituents must be reported to UDEQ and EPA if the release exceeds reporting quantities (RQs) or could threaten human health or the environment outside of DPG. RQs for EPA are variable depending on the hazardous constituents.

If an RQ of a chemical has been released, the appropriate agency or agencies will be notified by phone within 15 minutes, if possible, of the onset of the emergency and the following information will be provided:

- Name and telephone number of the reporter,
- Name and address of the facility,
- Time and type of incident (e.g. release, fire),
- Name and quantity of material(s) involved, to the extent known,
- Extent of injuries, if any, and
- Possible hazards to human health and the environment outside the installation.

The addresses and phone numbers of the agencies to which reports are made are:

Utah Department of Environmental Quality
288 North 1460 West
P.O. Box 144870
Salt Lake City, Utah 84116-4870
24-hour toll-free phone number (800) 572-6400 or
(801) 536-4123

U.S. Environmental Protection Agency, Region VIII
One Denver Place
999 18th Street, Suite 1300
Denver, Colorado 80202-2413
24-hour answering service (303) 293-1788
or
National Response Center (800) 424-8802

Within 15 days a written report will be provided to the Executive Director of UDEQ and the Regional Administrator of EPA, which will contain the following information:

- Name, address, and telephone number of the owner or operator,
- Name, address, and telephone number of the facility,
- Date, time, and type of incident,
- Name and quantity of materials involved,
- The extent of injuries, if any,
- An assessment of actual or potential hazards to human health and the environment, where applicable, and
- Estimated quantity and disposition of recovered material that resulted from the incident.

13.0 AMENDMENT OF THE CONTINGENCY PLAN: 40 CFR 264.54; R315-8-4.5

The DTTF Contingency Plan will be revised under any of the following circumstances:

- Revisions to facility permit,
- Failure of the plan in an emergency,
- Changes in the design, construction, operation, maintenance, or other circumstances that materially increase the potential for fires, explosions, or discharges of hazardous waste or hazardous waste constituents or changes in the response necessary in an emergency,
- Changes in the list of Environmental coordinators, and
- Changes in the list of emergency equipment.

The DTTF contingency plan will be reviewed semiannually if revisions have not been made. Revisions to the contingency plan, Environmental coordinator list, equipment lists, and memoranda of agreement require a formal modification of the permit in accordance with R315-8-4.5 and R315-3.

14.0 REFERENCES

CFR (Code of Federal Regulations). Title 40, Part 264. Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities.

UAC (Utah Administrative Code). R315-1 to R315-14, Utah Hazardous Waste Rules.

Figure 1. Evacuation Route from the DTTF

